

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

LAWRENCE LAMB

Plaintiff,

vs.

1:22-cv-00485-WJ-LF

JOSE CORDERO, CHRIS MARQUEZ,
and NEW MEXICO CORRECTIONS
DEPARTMENT,

Defendants.

**STIPULATED MOTION TO EXTEND DEADLINE TO
SUBMIT PRETRIAL ORDER**

Plaintiff Lawrence Lamb, by and through counsel, New Mexico Prison & Jail Project (Steven Robert Allen) and Adam S. Baker (Baker Law Office, LLC), and Defendants Jose Cordero and Chris Marquez, by and through counsel, Kennedy, Moulton & Wells, P.C. (Debra Moulton), hereby move this Court for an Order extending the deadline to submit a pretrial order as set forth in this Court's Order entered on November 18, 2022, ECF No. 22. As grounds therefore, the parties state:

1. On April 10, 2023, Defendants Jose Cordero and Chris Marquez filed a Second Motion for Summary Judgment, ECF No. 46, and a Memorandum Brief in Support of Their Second Motion for Summary Judgment, ECF No. 47.
2. Notice of briefing completed was entered on May 8, 2023, ECF No. 56.
3. The existing deadline for the parties to file a draft pretrial order is June 8, 2023. *See* Order Granting Unopposed Motion to Extend Scheduling Order Deadlines, ECF No. 22.

4. The Court's ruling in the pending motion described above will be crucial in developing the contents of the parties' draft pretrial order.
5. Therefore, the parties seek an extension of the deadline to file their pretrial order draft of forty-five (45) days after the Court's ruling on the outstanding dispositive motion described in ¶¶ 1-2 above, or as otherwise determined by the Court.
6. A trial date has not yet been set in this matter; therefore, the requested extension should not interfere with any future trial setting.
7. In consideration of the forgoing, it is respectfully requested that the deadlines set forth in this Court's November 18, 2023 Order, ECF No. 22, be extended as follows:

Event	Current Deadline	New Deadline
Pretrial Order: Plaintiffs to Defendants by:	May 26, 2023	Thirty (30) days following Court's ruling on dispositive motion, ECF No. 46.
Pretrial Order: Defendants to Court by:	June 6, 2023	Forty-five (45) days following Court's ruling on dispositive motion, ECF No. 46.

WHEREFORE, the parties respectfully request that this Court enter an Order extending the deadline to submit a pretrial order in accordance with Paragraph 7 above.

Respectfully submitted,

NEW MEXICO PRISON & JAIL PROJECT

/s/ Steven Robert Allen

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